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Honorable Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza
East Brooklyn, New York 11201
Courtroom: 6G North

Via EFC

Re: *Edmondson, et al. v. Raniere, et al.*, 1:20-CV-00485-EK-CLP

Dear Judge Komitee:

I am writing in response to your Preliminary Order of Protection and Order to appear at a conference held on February 17th 2022, and to provide some clarity to Mr. Glazers' accusation in document 136.

First, I'd like to assure you that I am, and will, respect the temporary order you have put in place.

Next, I'd like to request to appear remotely on the 17th for the following reasons: my dog's current end of life struggle, my finances, and my own safety.

I no longer live in NY and my dog, RJ, is actively dying (ex-parte of his diagnosis and prognosis upon request). It could be any day, and I am not willing to leave him alone at this juncture. He is the one being who has been there with me through all of these trials, and it is my turn to be there for him. I can't place the, presently, daily evaluation of humane euthanasia in a caretakers hands for the time I would need to be away. I also do not have the funds it would require to provide the significant amount of specialized care he currently needs.

As you know, I am representing myself pro se because I currently do not have the funds for legal representation. In addition, my appearance in person would cost me upwards of \$1,750 dollars, plus a day of work, for travel, accommodations, and dog care in order to travel from my home in Wisconsin to the Courthouse. I don't have the points, miles, money or credit to cover this travel expense at this juncture (ex-parte of finances upon request).

As a woman who has earned her degree and fruitful career as a physician, medical director and entrepreneur from nothing, I am in this fragile financial position because of repeated defamation and "terrorization" (if we want to use that word) by the Plaintiffs who are claiming to need protection. Over the past almost five years they have engaged in a relentless campaign against me, carefully spinning a false narrative and destroying my reputation, countless relationships, my life's work, and my livelihood, for their benefit. As a result, I don't have the means to be in person, however, more than happy to make myself available by telephone or videoconference.

The following examples may more clearly illustrate the Plaintiffs' fraudulent and defamatory efforts to further their material interests and the reasons for my current financial position. In major productions such as: the HBO docuseries "The Vow," STARZ docuseries "Seduced," various mainstream media outlets, books, podcasts, and the like, they have cast me as a caricature in part, by utilizing my name, credibility, and credentials to further their endeavors.

Lead Plaintiff Sarah Edmondson filed a complaint against me to the New York Office of Professional Medical Conduct (OPMC). The OPMC issued a formal response to Sarah Edmondson's complaint stating they would not pursue the matter further because "the issues you describe did not occur within the doctor-patient relationship... [they] are not medical misconduct as described by New York State Education Law Section 6530."¹ In order to overcome this decision, Ms. Edmondson fashioned a media campaign to highlight and dramatize her branding experience, and tie my medical career to a personal endeavor we ventured into together. She created multiple falsities and exaggerations and shared them with The Frank Report, The New York Times, ABC News, HBO in the docuseries "The Vow," and featured them in her book "Scarred: The True Story of How I Escaped NXIVM, the Cult That Bound My Life" without my permission. She changed the names of other characters to protect their anonymity, but not mine.

Ms. Edmondson clearly and intentionally crafted a story across multiple major media venues that destroyed my reputation, my career, and my livelihood and incited fear and hatred toward me in the public for her own personal gain (see exhibits 2-5), leading me to the financial position I am currently in, and placing her in a position to extort further value. Respectfully, my ability to defend myself is what needs to be protected, Your Honor, in this legal proceeding and in the public sphere.

Plaintiff India Oxenberg created, produced, starred in and premiered an entire STARZ docuseries, "Seduced," on Oct. 19th 2020, during my medical hearing, which garnered hundreds of thousands of views. In this production, it is stated clearly by India's mother, Catherine Oxenberg, India's counsel, and India herself that India needed to portray herself in the media as a "victim" in order to avoid being prosecuted [unethically] by the FBI like Allison Mack was.² In this fictitious and defamatory production, India highlights me - the only other woman in her DOS circle that she reveals the identity of. She does so specifically as "Dr. Roberts,"³ knowing we had no patient-physician relationship (she never once referred to me as "Dr." while we were in DOS together), and knowing my medical hearing was underway.

I, unfortunately, am led to believe she did this for no other reason than to use my authority and credibility as a doctor to create the appearance of imbalanced power between us, and further depict herself as a victim (to evade criminal charges and reap monetary reward). India and I were equals in DOS. In fact, India earned and held more power than I, as she had built a hierarchy of women in her line, and was privy to more information and authority as such. She, nor STARZ, had permission to use my likeness, nor sought any.

No doubt, these are concerted defamatory efforts by many of the Plaintiffs involved to further their personal agendas. Productions as large as HBO's "The Vow" and/or STARZ's "Seduced" premiered footage that Mark Vicente sold without permission or likeness release, and featured many of the defendants, including myself, and others. Bonnie Piesse appeared in "The Vow" many times, as did, Mark Vicente, Anthony Ames, and many others, named or anonymously.

¹ Letter from the OPMC in response to Sarah Edmondson's complaint.

² Seduced, Episode 4: 38:44 – 39:44, 44:33-45:00, 45:20- 45:35

³ Seduced, Episode 4: 5:28

Momentous and conspiring efforts such as these have led to job loss⁴ (Exhibit 3), reputation decimation, countless harassing emails, voice messages, and social media threats, not only to encourage me "to kill myself"⁵ (Exhibit 4), but to threaten continual defamation "to make sure I can never financially support myself again" and am "put in prison"⁶ (Exhibit 5).

This is "terrorization," Your Honor, not a few tweets I made in support of the revelation of the identities of my accusers by others so that I may know who is making such egregious and bold accusations against me, and properly defend myself. Respectfully, supporting public accountability in a day and age where trial by media can lead to wrongful convictions and legal overreach (in this case, revocation of medical licensure) is not only necessary, but responsible. That said, Your Honor, I have, and will, respect any order you put in place during these proceedings shall this case be determined to proceed.

Lastly, over the past four years, Plaintiffs' counsel, Neil Glazer, reinforced this false and harmful narrative in multiple articles utilizing language that creates the appearance of a "malicious enterprise or cult," and paints me as a brainwashed devotee. "When this many *diehard Raniere supporters* gather, it is a *cause for concern*,"⁷ said Neil Glazer to the Times Union July 10th, 2020. "If Raniere and his *devotees* had any... This is just more manipulation of his *disciples*."⁸ claimed Neil Glazer July 14th 2020 to the Times Union. Utilizing language like *devotees* and *disciples* is a devious attack, as it implies the only reliable solution is to agree with Glazer... who is lying. "*Cause for concern*" aims to incite *some sort of non-specific* fear in the public related to my well-intended ventures. He now, similarly pretends that any words that come from the Defendants' mouths hurt his clients (Although, sometimes the truth hurts this is not abuse or terrorization). His arguments are artful, in that they lack factual basis, and cannot be taken seriously. They aim destroy my credibility, silence me, cut me off at the knees, and vilify me in some fantastical way to serve his larger monetary scheme, rather than provide any specifics of actual harm or wrongdoing.

The Plaintiffs support this type of behavior, as they hired this man and continue to support his efforts to vilify me, and cast them as helpless victims in need of protection.

For these reasons, Your Honor, I am in a very compromised financial circumstance (and have a very sick puppy to look after). I respectfully request to attend the conference remotely with your Honors permission and beseech these clarifications be seriously examined.

Respectfully and Sincerely,

/s/ Danielle Roberts
Danielle Roberts, DO, MS
Pro / se

⁴ Only a small part of livelihood destruction [Exhibit 3]

⁵ Emails illustrating harassment and encouraging suicide [Exhibit 4]

⁶ Voice notes, conversations threatening defamation, and prosecution [Exhibit 5]

⁷ <https://www.timesunion.com/news/article/NXIVM-members-dancing-for-Raniere-outside-federal-15400460.php>

⁸ <https://www.timesunion.com/news/article/Keith-Raniere-reaching-out-to-NXIVM-foe-Frank-15648069.php>